

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

BILLIE CLARK, on behalf of himself
and those similarly situated,

Plaintiffs,

v.

MILLER VALENTINE PARTNERS LTD
II, et al.

Defendants.

Civil Action No. 1:20-cv-295-DRC

JUDGE DOUGLAS R. COLE

**JOINT MOTION TO STAY
PROCEEDINGS PENDING
SETTLEMENT DISCUSSIONS**

COMES NOW Defendants MVAH Partners LLC, MVAH Management LLC, and MV Residential Property Management, LLC (“Defendants”) and Plaintiff Billie Clark on behalf of himself and those similarly situated, (“Clark”) (collectively referred to as the “Parties”), by and through counsel, and hereby jointly move to stay this matter while the parties confer and discuss a possible resolution to this matter. The Parties are currently engaged in negotiations and believe that there is potential for a mutually agreeable settlement that will provide a fair, cost-effective resolution to this matter. In order to allow the parties to sufficient time to conduct and review calculations related to this case, the Parties respectfully request that this matter be stayed while these negotiations occur. The parties will file a joint status report within 3 business days following an agreement to settle the claims or a breakdown of negotiations.

Dated: December, 9, 2020

Respectfully submitted,

/s/Matthew Coffman

Matthew J.P. Coffman (0085586)
COFFMAN LEGAL, LLC
1550 Old Henderson Road, Suite 126
Columbus, Ohio 43220
T: (614) 949-1181
F: (614) 386-9964
mcoffman@mcoffmanlegal.com

/s/ Daniel I. Bryant

Daniel I. Bryant (0090859)
BRYANT LEGAL, LLC
1550 Old Henderson Road, Suite 126
Columbus, Ohio 43220
T: (614) 704-0546
F: (614) 573-9826
dbryant@bryantlegalllc.com

Counsel for Named Plaintiff and those similarly situated

/s/ Michael B. Mattingly

Michael B. Mattingly (OH 0089847)
Jonathan M. Kelly (OH 0095738)
Dinsmore and Shohl, LLP
255 E 5th Street, Suite 1900
Cincinnati, OH 45202
T: (513) 977-8200
F: (513) 977-8141
Michael.mattingly@dinsmore.com
Jon.kelly@dinsmore.com

Counsel for Defendants, MVAH Partners, LLC and MVAH Management, LLC

/s/ Timothy G. Pepper

Timothy G. Pepper (0071076)
Trial Attorney
TAFT STETTINIUS & HOLLISTER LLP
40 N. Main Street, Suite 1700
Dayton, Ohio 45423
Phone: (937) 641-1740
Fax: (937) 228-2816
pepper@taftlaw.com

Counsel for Defendant MV Residential Property Management, LLC

CERTIFICATE OF SERVICE

I hereby certify that on December, 9, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

/s/ Daniel I. Bryant

Daniel I. Bryant (0090859)